RUBINSTEIN & COROZZO, LLP

COUNSELORS AT LAW

260 MADISON AVENUE, 22ND FLOOR NEW YORK, N.Y. 10016 TELEPHONE (212) 545-8777; FAX (917) 722-8206 INFO@RUBCORLAVI.COM

RONALD RUBINSTEIN JOSEPH R. COROZZO Of Counsel: MARSHALL A. MINTZ

ANGELA D. LIPSMAN (NY; NJ)

Hon. Vernon S. Broderick United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square, Room 415 New York, NY 10007 September 29, 2022

APPLICATION GRANTED SO ORDERED A. VERNON S. BRODERICK U.S.D.J. 09/30/2022

> Re: United States v. Franzone 21 CR 446 (VSB)

Dear Judge Broderick,

We represent Defendant Andrew Franzone ("Franzone") in the above-captioned case. We write to request permission for Mr. Franzone to travel to Florida to meet with local counsel.

Mr. Franzone would leave for Florida this coming Sunday, October 2, 2022 and return to New York on Wednesday, October 5, 2022.

We have conferred with the Government, and have been advised that the Government has no objection, providing that Pretrial Services also has no objection.

We have also reached out to Pretrial Services, and have been advised that Pretrial Services has no objection to this request. Pretrial Services has been sent an anticipated itinerary. Should the application be granted, Mr. Franzone will confirm the flight times for Pretrial Services.

We note that the Court granted Mr. Franzone's last three applications to travel. Orders, ECF # 29, ECF # 43, ECF # 51.

Wherefore, we respectfully request that Mr. Franzone be permitted to travel to Florida from Sunday, October 2, 2022 to Wednesday, October 5, 2022.

Case 1:21-cr-00446-VSB Document 55 Filed 09/30/22 Page 2 of 2

RUBINSTEIN & COROZZO, LLP

Thank you for your consideration.

Respectfully submitted,

Angela D. Lipsman, Esq

AUSAs Alexander Rossmiller and Kiersten Fletcher (via ECF) Pretrial Services Officer Jazzlyn Harris (via email) cc: